

Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

Waterbury Companies Inc
Waterbury Companies Inc. - Independence Facility
Independence, Tangipahoa Parish, Louisiana
Agency Interest Number: 2301
Activity Number: PER20050001
Proposed Permit Number: 2840-00031-V2

I. APPLICANT

Company:

Waterbury Companies Inc. - Independence Facility
PO Box 640
Independence, Louisiana 70443

Facility:

Waterbury Companies Inc
129 Calhoun St
Independence, Tangipahoa Parish, Louisiana

II. FACILITY AND CURRENT PERMIT STATUS

Waterbury Companies Inc. - Independence Facility, an existing pesticide and air product packaging facility, began operation in February of 1981 as was then owned by Cline-Buckner, Inc. Waterbury Companies, Inc. purchased the facility on September 7, 1990. The Waterbury Companies Inc. - Independence Facility currently operates under Permit No. 2840-00031-V1, issued July 5, 2001.

Waterbury Companies Inc. - Independence Facility is a designated Part 70 source. Part 70 permits have been issued to the operating units within the complex. These include:

Permit No.	Unit or Source	Date Issued
2840-00031-V1	Independence Facility	07/05/2001

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III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application and Emission Inventory Questionnaire were submitted by Waterbury Companies Inc on June 29, 2005 requesting a Part 70 operating permit renewal and modification. Additional information was received on July 12, 2005, June 14, 2006, September 8, 2006, and October 4, 2006.

Project

Waterbury proposes to add a second aerosol line to the facility in this permit modification. This addition comes in light of the projected growth as shown from production data. The addition of the second aerosol line was previously permitted in permit no. 2840-00031-V0, however, due to other factors relating to business, no construction occurred. Five (5) new fugitive emission sources in the production area of the warehouse are being added due to projected growth in business, causing the total annual emissions of VOCs to increase.

Proposed Permit

Permit 2840-00031-V2 will be the renewal and modification of Part 70 operating permit 2840-00031-V1 for the Independence Facility.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	0.18	1.33	+1.15
SO ₂	-	-	-
NO _x	-	-	-
CO	-	-	-
VOC	209.18	323.19	+114.01

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

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Applicability and Exemptions of Selected Subject Items

{List the applicability and exemptions of selected items in the table below.}

ID No.	Requirement	Note
Facility Wide	NESHAP for Pesticide Active Ingredient Production, Subpart MMM [40 CFR 63.1360]	DOES NOT APPLY. Waterbury is not a major source of hazardous air pollutants nor does it produce pesticides. Purchased pesticides are only blended and/or packaged.
85-44, 85-45, 85-46, 01-75, and 01-76	NSPS Subpart Kb- Standards of Performance for Volatile Organic Liquid Storage Vessels [40 CFR 60.110b]	DOES NOT APPLY. Sources have storage capacities less than 19,000 gallons.

Prevention of Significant Deterioration/Nonattainment New Source Review

PSD is not required. This is an attainment area.

MACT Requirements

Not applicable.

Air Quality Analysis

Not applicable.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

Not applicable.

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VI. PERIODIC MONITORING

All periodic monitoring is conducted in accordance with state and federal regulations. See Specific Requirements of the draft Part 70 permit renewal and modification for monitoring requirements.

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

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Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.